

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897**

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Document Relates to: ALL CASES)

**PLAINTIFFS’ LEADERSHIP GROUP’S MOTION TO COMPEL DEFENDANT
UNITED STATES OF AMERICA TO PRODUCE DIGITIZED MUSTER ROLLS**

Plaintiffs, through the Plaintiffs’ Leadership Group (the “PLG”), pursuant to Fed. R. Civ. P. 26 and 37, hereby respectfully move the Court to compel the Defendant United States of America to provide relevant electronically stored information (“ESI”) concerning scanned-in muster rolls and other military records.

In further support, the PLG files its brief in support and supporting exhibits.

The PLG show the Court that the PLG met and conferred with counsel for Defendant and was unable to resolve the matter without Court involvement.

Wherefore, the PLG respectfully requests that the Court enter an Order granting the instant motion to compel and compelling Defendant (1) to immediately produce a copy of the partial data that has already been digitized, and (2) to update that production with a complete copy of the digitized information by January 31, 2026, when Defendant has represented the project will be complete.

DATED this 2nd day of December, 2025.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com

Lead Counsel for Plaintiffs

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*) Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
ecabraser@lchb.com

Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
mwallace@wallacegraham.com

Co-Lead Counsel for Plaintiffs

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)
The Dowling Firm PLLC
Post Office Box 27843
Raleigh, North Carolina 27611
Telephone: (919) 529-3351
mike@dowlingfirm.com

Co-Lead Counsel for Plaintiffs

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003
Telephone: 212-558-5802
rgreenwald@weitzlux.com

Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III
Lewis & Roberts, PLLC
3700 Glenwood Ave., Ste. 410
Raleigh, NC 27612
Telephone: (919) 981-0191
jar@lewis-roberts.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, I electronically filed the foregoing using the Court's Case Management/Electronic Case Files system, which will send notice to all counsel of record.

/s/ J. Edward Bell, III_____

J. Edward Bell, III